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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Wild Horse Education, a non-profit
corporation,

Plaintiff,

v.

United States Department of Interior
Bureau of Land Management,

Defendant.

Case No. 3:25-cv-00152-MMD-CSD

**Joint Stipulation for Extension Of Time
To File Response To Amended
Complaint**

(Second Request)

Pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure and Rule IA 6-1 of this Court's Local Rules, Plaintiff Wild Horse Education, a non-profit corporation, and Federal Defendant, United States Department of Interior, Bureau of Land Management ("BLM"), through undersigned counsel, hereby stipulate and agree as follows:

1. Plaintiff filed its First Amended Complaint for Declaratory and Injunctive Relief on July 03, 2025 (ECF No. 17).

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2. Per a stipulation and order, the parties agreed that Federal Defendant's response to Plaintiff's Amended Complaint is due by July 25, 2025 (ECF No. 20).
3. The parties now agree to extend the time for Federal Defendant to respond to Plaintiff's Amended Complaint up to and including August 22, 2025.
4. The BLM produced additional documents to Plaintiff on July 22, 2025, which the BLM believes to be responsive to information Plaintiff requested.
5. Counsel for the Plaintiff will be out of the office for the next two weeks on pre-scheduled leave.
6. In light of her pre-scheduled leave, Plaintiff's counsel needs additional time to review the documents that the BLM produced to Plaintiff on July 22, 2025, and confer with her client to determine if Plaintiff is satisfied with the documents produced. Likewise, Federal Defendant needs the additional time to confer with Plaintiff's counsel regarding whether BLM's production of documents satisfy Plaintiff's FOIA request such that it can prepare any necessary response to Plaintiff's Amended Complaint.

Accordingly, the Parties respectfully request that the Court extend the deadline for the United States to file a responsive pleading to Plaintiff's Amended Complaint up to and including August 22, 2025.

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This stipulated request is filed in good faith and not for the purpose of undue delay.

Respectfully submitted this 24th day of July 2025.

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IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: _____